

June 11, 2024

By CM/ECF

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

Re: Kashef v. BNP Paribas SA, No. 16-cv-3228 (AKH)(JW)

Dear Judge Hellerstein,

Pursuant to Your Honor's Order of May 6, 2024, ECF No. 504, the parties respectfully submit this joint letter to notify the Court that with respect to the following filings:

- Declaration Of Brent W. Landau In Support Of Plaintiffs' Motion For Class Certification (and accompanying exhibits) (ECF No. 422);
- Declaration Of Charity E. Lee In Support Of BNP Paribas S.A. And BNP Paribas US Wholesale Holdings, Corp.'s Motion For Summary Judgment, Rule 56.1 Statement Of Undisputed Facts In Support Of Their Motion For Summary Judgment, In Opposition To Plaintiffs' Motion For Class Certification And *Daubert* Motion To Exclude The Proposed Expert Testimony Of Prakash Khatri (and accompanying exhibits) (ECF No. 435);
- BNP Paribas S.A. And BNP Paribas US Wholesale Holdings, Corp.'s Statement Of Material Facts As To which There Is No Genuine Issue Pursuant To Local Civil Rule 56.1 (ECF No. 437);
- Plaintiffs' Counterstatements Of Material Facts And Statement Of Additional Material Facts Pursuant To Local Civil Rule 56.1 (ECF No. 463);
- Declaration Of Scott A. Gilmore In Support Of Plaintiffs' Opposition To Defendants' Motion For Summary Judgment, Counterstatement Of Material Facts And Statement Of Additional Material Facts Pursuant To Local Civil Rule 56.1, Reply In Support Of Motion For Class Certification, And Motion To Seal (and accompanying exhibits) (ECF No. 464);
- Supplemental Declaration Of Charity E. Lee In Support Of BNP Paribas S.A. And BNP Paribas US Wholesale Holdings, Corp.'s Reply Memorandum Of Law In Support Of Their Motion For Summary Judgment And Counterstatements To Plaintiffs' Statement Of Additional Material Facts Pursuant To Local Civil Rule 56.1 (and accompanying exhibits) (ECF No. 469);
- The BNPP Defendants' Counterstatements To Plaintiffs' Statement Of Additional Material Facts Pursuant To Local Civil Rule 56.1 (ECF No. 470);
- Plaintiffs' Motion To Enforce Defendants' Guilty Plea Agreements and Unseal Judicial Documents (and accompanying exhibits) (ECF No. 490);

the parties will file updated versions of these documents and exhibits with the agreed upon redactions as to BNPP materials that were the subject of the several motions to seal. *See* ECF Nos. 416, 428, 432, 445, 455, 467, 468. Certain of these filings will also contain updated public redacted versions of Plaintiffs' materials that were previously under seal.

Respectfully submitted,

/s/ Kathryn Lee Boyd
Kathryn Lee Boyd
HECHT PARTNERS LLP
125 Park Avenue, 25th Floor
New York, NY 10017
(646) 502-9515
lboyd@hechtpartners.com

/s/ Michael D. Hausfeld
Michael D. Hausfeld
HAUSFELD LLP
888 16th Street NW, Suite 300
Washington, DC 20006
(202) 540-7200
mhausfeld@hausfeld.com

Attorneys for Plaintiffs

/s/ Karen Patton Seymour
Karen Patton Seymour
125 Broad Street
New York, New York 10004
T: 212-558-3196
seymourk@sullcrom.com

/s/ Carmine D. Boccuzzi, Jr.
Carmine D. Boccuzzi, Jr.
One Liberty Plaza
New York, New York 10006
T: 212-225-2000
cboccuzzi@cgsh.com

*Attorneys for BNP Paribas and BNP Paribas
US Wholesale Holdings, Corp.*

Pursuant to Section 8.5(b) of the Electronic Case Filing Rules & Instructions for the United States District Court for the Southern District of New York, the use of conformed electronic signatures is with the consent of all signatories to this filing.